

FILED

JUL 06 2016

CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
REBECCA SHOE)
)
)
Defendant.)

Criminal No. 16-CR-3 0035

VIO: 18 U.S.C. § 1341

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1
(Mail Fraud)

BACKGROUND

1. Knapheide Manufacturing Company (Knapheide) is a corporation located in Quincy, Illinois.
2. On or about July 19, 2004, Rebecca Shoe began working for Knapheide as a human resources and accounting manager.
3. In or about 2009, Rebecca Shoe became a "remote" employee for Knapheide based out of North Carolina.

4. As a remote employee Shoe's duties included traveling to different Knapheide offices in the United States to assist in setting up those new regional offices.

5. In order to be reimbursed for travel related expenses such as airfare, hotels and rental cars, Shoe submitted weekly expense reports and provided receipts for expenses incurred.

6. Shoe also had access to company issued credit cards and petty cash located in the regional company offices.

7. On or about December 1, 2012 through May 15, 2015, Shoe used company credit cards and petty cash to purchase personal expenses including merchandise from Amazon.com, Home Depot and to pay her residential electric bill with South River EMC.

8. As part of a scheme and artifice to defraud Knapheide, beginning on or about December 1, 2012 through May 15, 2015, Rebecca Shoe submitted expense reports with altered receipts.

9. Shoe altered receipts by changing the payment method on the receipts to reflect payments using her personal credit cards instead of the company credit card.

10. Shoe submitted the altered receipts with her expense reports to Knapheide and received reimbursements for payments she had not in fact placed on her personal credit card.

11. Through Shoe's scheme to defraud, Shoe obtained at least \$70,000.00 from Knapheide in the form of checks and use of the company's credit cards and petty cash.

12. On or about February 20, 2014, in the Central District of Illinois, and elsewhere,

REBECCA SHOE,

the defendant herein, for the purpose of executing said scheme did knowingly cause to be delivered by the United States mail, according to the direction thereon, an envelope mailed from Knapheide, a company headquartered in Quincy, Illinois, which was a check number 157121 in the amount of \$3,028.08, from Knapheide for expenses which were inflated beyond the actual expenses incurred.

All in violation of Title 18, United States Code, Section 1341.

THE GRAND JURY FURTHER CHARGES:

COUNT 2
(Mail Fraud)

1. The grand jury realleges and reaffirms the allegations in Count 1 and paragraphs 1 through 9 of this indictment as through fully set forth herein.

2. On or about July 1, 2014, in the Central District of Illinois, and elsewhere,

REBECCA SHOE,

the defendant herein, for the purpose of executing said scheme did knowingly cause to be delivered by the United States mail, according to the direction thereon, an envelope mailed from Knapheide, a company headquartered in Quincy, Illinois, which was a check number 167607 in the amount of \$2,529.39, from Knapheide for expenses which were inflated beyond the actual expenses incurred.

All in violation of Title 18, United States Code, Section 1341.

THE GRAND JURY FURTHER CHARGES:

COUNT 3
(Mail Fraud)

1. The grand jury realleges and reaffirms the allegations in Count 1 and paragraphs 1 through 9 of this indictment as through fully set forth herein.
2. On or about October 1, 2014, in the Central District of Illinois, and elsewhere,

REBECCA SHOE,

the defendant herein, for the purpose of executing said scheme did knowingly cause to be delivered by the United States mail, according to the direction thereon, an envelope mailed from Knapheide, a company headquartered in Quincy, Illinois, which was a check number 174928 in the amount of \$2,417.70, from Knapheide for expenses which were inflated beyond the actual expenses incurred.

All in violation of Title 18, United States Code, Section 1341.

THE GRAND JURY FURTHER CHARGES:

COUNT 4
(Mail Fraud)

1. The grand jury realleges and reaffirms the allegations in Count 1 and paragraphs 1 through 9 of this indictment as through fully set forth herein.

2. On or about February 11, 2015, in the Central District of Illinois, and elsewhere,

REBECCA SHOE,

the defendant herein, for the purpose of executing said scheme did knowingly cause to be delivered by the United States mail, according to the direction thereon, an envelope mailed from Knapheide, a company headquartered in Quincy, Illinois, which was a check number 185108 in the amount of \$1,154.82, from Knapheide for expenses which were inflated beyond the actual expenses incurred.


All in violation of Title 18, United States Code, Section 1341.

A True Bill.

s/ Foreperson

Foreperson

s/ John E. Childress


JAMES A. LEWIS
UNITED STATES ATTORNEY
CCC